

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

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)  
Investigation by the Department on its own )  
Motion as to the propriety of the rates and )  
charges set forth in M.D.T.E No. 17, filed with )  
the Department on May 5, 2000 to become ) D.T.E. 98-57, Phase III  
effective June 4 and June 6, 2000 by New )  
England Telephone and Telegraph Company )  
d/b/a Bell Atlantic - Massachusetts )  
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VERIZON MASSACHUSETTS'

MOTION FOR EXTENSION OF TIME

Verizon Massachusetts ("Verizon MA") requests that the Department grant additional time for Verizon MA to file an illustrative tariff that would provide competitive local exchange carriers ("CLEC") with line sharing using fiber-fed loops in compliance with the Department's Order issued on September 29, 2000. Order at 86-87. In support of its Motion, Verizon MA states as follows:

In its Order, the Department found that further investigation is required to determine whether "plug and play" options proposed by the CLECs for line sharing arrangements are reasonable and should be adopted by the Department. Order at 87-88. The term "plug and play" refers to the placement of line cards in Digital Loop Carrier ("DLC") electronics at the remote terminal ("RT") that would perform an integrated DSLAM and splitter function for the entire shared loop purchased by the CLEC. Order at 80. To further its investigation, the Department directed Verizon MA to file within 30 days of the Order a proposed tariff offering that "would enable CLECs to place or have Verizon place CLEC-purchased line cards in Verizon's DLC electronics at the RT." Order at 87.

Notwithstanding the Department's pending ruling on Verizon MA's Motion for Partial Reconsideration on this issue, the Company needs additional time to develop such a tariff filing because, as Verizon MA's witnesses testified, the Company does not currently deploy line cards in DLC at RTs in Massachusetts. Order at 88. Therefore, Verizon MA must start from scratch to design the service offering, prepare a business plan, engineer the service, and develop service and technical descriptions.

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The Company must also assess the potential demand for the service, prepare cost studies and establish appropriate prices. Moreover, because of the scope and ground-breaking nature of the work involved, Verizon MA will, among other things, need to convene a diverse group of responsible personnel to perform the required work completely and accurately. This is a time-consuming and complex process that requires considerably more time than the one-month deadline allows. (1)

Verizon MA also requests an extension of time to coordinate this proposed Massachusetts tariff filing with the Federal Communications Commission's ("FCC") current proceeding on many of these same issues. See CC Docket Nos. 98-147 and 96-98, FCC 00-297, Order on Reconsideration and Second Further Notice of Proposed Rulemaking in CC Docket No. 98-147 and Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98 (rel. August 10, 2000) ("Collocation Remand Order"). Moreover, should Verizon MA need to make a related federal filing to proceed with such a proposed tariff offering in Massachusetts, the Company should be allowed to do so prior to filing its tariff proposal.

As the Department is aware, the FCC recently granted SBC Communications, Inc.'s request for waiver of certain merger conditions to enable SBC to own specific equipment used to provide advanced services within its serving area. (2) See CC Docket No. 98-141, ASD File No. 99-49, In the Matter of Ameritech Corp. and SBC Communications, Inc., Second Memorandum Opinion and Order (rel. September 8, 2000). By obtaining this waiver, SBC is able to proceed with its plans for "Project Pronto," in which SBC will install SBC-owned line cards in RTs for CLECs, thereby providing them with unbundled access to packet switching. Verizon is currently reviewing the implication of the SBC relief and how it impacts Verizon's ability to satisfy the Department's requirements in an effective and efficient manner. Absent similar relief, Verizon MA would be unable to satisfy the Department's objective.

Finally, in an effort to address any potential competitive concerns, Verizon MA would agree to make available access to these potential capabilities to all carriers, including Verizon's separate data affiliate ("SDA"), at the same time and subject to the same non-discriminatory rates, terms and conditions. In the meantime, if Verizon seeks and obtains an FCC waiver prior to the establishment of the SDA, Verizon MA will not utilize this arrangement on a retail basis until a wholesale offering is made available to all CLECs in Massachusetts.

WHEREFORE, for all of the foregoing reasons, Verizon MA has demonstrated that good cause for an extension exists. Therefore, Verizon MA respectfully requests that the Department grant its request for an extension of the due date for its filing of an illustrative tariff to no later than 6 months from the date of the Department's ruling on this motion.

Respectfully submitted,

VERIZON MASSACHUSETTS

By its attorney,

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1. 1 Verizon MA estimate that a minimum of six additional months will be required to complete the necessary activities and review the results prior to filing its proposed tariff offering with the Department in compliance with its Order.

2.

2 Specifically, this would include the plug-in or line cards installed in RTs and the necessary supporting equipment installed in central offices.